

Marciana Nicolas-Dollard
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September 9, 2014

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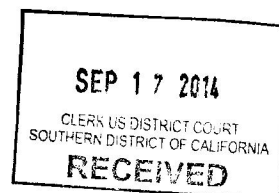
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SOUTHERN DISTRICT OF CALIFORNIA
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W.Samuel Hamrick, Jr., Clerk of Court
United States District Court
Southern District of California
333 West Broadway Suite 420
San Diego California 92101



Reference: Second Response to Summons in a Civil Action Case No. 3:14-CV-0291 LAB-JLB
received July 21, 2014

Dear Mr. Hamrick,

Please find enclosed the letter , response to Civil Action , image pictures I googled from street view 2014 of Helix Center clearly showing the handicapped and van accessible parking spaces in the Helix Center Strip Mall located at 7309 University Avenue La Mesa Ca 91942 , ADA Design Guide and the Civil Cover Sheet I mailed to the office of Phyl Grace Esq. Attorney to Mr. Chris Langer in a Case against me LangerV. Marciana Nicolas- Dollard.

Thank you for sending me the Pro Se form and instructions I did received 9/8/2014.

Thank you for your understanding and may God bless you and your family

Respectfully,
Marciana N. Dollard
Marciana N. Dollard

Defendant: Civil Action No. 3:14-CV-01291 LAB- JLB

September 13, 2014

Dear Mr. Hamrick,

Please find additional copies of the letter I wrote to Atty. Phyl Grace mailed and delivered to her office 09/12/14.

Please let me know if you do need additional information from me I would appreciate it very much.
Please accept my sincere thanks for your help.

Respectfully,
Marciana Nicolas- Dollard
Marciana Nicolas- Dollard

Marciana Nicolas- Dollard
2323N. Hamlin Rd.
Hamlin, NY 14464
September 7, 2014
Defendant Case No. 3:14-CV-01291-LAB_JLB

Phyl Grace, Esq.
9845 Erma Rd., Suite 300
San Diego, CA 92196-2490

Re: Second Response to Summons in a Civil Action Case No. 3:14-CV-01291-LAB-JLB

Factual Events:

My name is Marciana Nicolas- Dollard I am representing my self as the defendant to civil Actions against me in Langer V. Marciana Nicolas-Dollard.

I am the owner of Helix Center Strip Mall located at 7309 University La Mesa CA 91942. The center has been serving the community of La Mesa and Neighboring towns for almost 50 years now and we are blessed and honored to be a part of the community. The Strip Mall has 10 tenants of various kinds of businesses.

The ADA Design Guide states that mall or shopping centers that has 26 to 50 car parking space has to have 2 handicapped accessible 60 inches wide aisles, 1 van accessible parking space 96 inches wide access aisle and 1 accessible parking space minimum 60 inches wide access aisle and all be striped and well designated.

The Helix Center Strip Mall has 29 parking spaces for cars and we are in compliance with the ADA Design Guide. We have 2 Handicapped accessible parking spaces 1 Van accessible 96 inches and 1 60 inches wide access and signs are posted on the wall and mounted on the pole.

April 8, 2013 Jacques Paving Inc. located in San Diego did the cleaning up and restriping of the entire parking lots including the Handicapped, the Van accessible and the 60 inches wide access parking spaces.

The pictures enclosed that I googled of the entire Helix Center street dated June 2014 and the pictures by e mail shows very well the Handicapped, the Van accessible and the 60 inches wide access are very well marked , and visible and well designated and we are very pleased with the restriping done by Jacques Paving Inc. and they do the restriping every 2 year.

January 2014 Mr. Chris Langer alledgedly claimed that he visited Top Gear Guitar Shop and allegedly claimed that the Handicapped and the Van accessible parking spaces were paved and faded and he had suffered some degree of inconvenience and we believed that he judged it wrong and misguided and it is not the truth and looking at the enclosed pictures we can tell that he was very very wrong. Mr. Langer did not complain to the owner of the Guitar Shop in one way or another.

We do not intend to discriminate disabled people, we respect their dignities effort and courage and

may God bless them.

Recently August 30, 2014 we hired again the Jacques Paving Inc. to restriped the 1 60 access aisle to 96 inches wide access aisle and made it into another Van accessible 96 inches wide accessible parking space to give more convenience to our customers in the Helix Center Mall.

We strongly believed that we did not violate the American with Disabilities Act, Unruh Civil Right Acts California Disabled Person Act and we did not commit any Negligence. With the help of God we will strive to keep the Helix Center in compliance with the Laws, keep it clean and safe for our good and loyal customers.

We would greatly appreciate if you could dismissed or dropped this case against me and we trust the Lord for we want to do good so we can be good. Thank you and may God bless you all.

Respectfully,


Marciana Nicolas- Dollard

Enclosures:

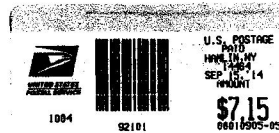
Pictures of Helix Center Strip Mall Via Google

Pictures of the Handicapped and Van accessible Parking Spaces by E-Mail from my son

Emilio Danque

ADA Design Guide

Copy of this letter to be sent to the Clerk of Court Southern District Court of CA.



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Marciana Nicolas- Dollard
2323 N. Hamlin Rd.
Hamlin NY 14464

Mr. W. Samuel Hamrick Jr. Clerk of Court
United States District Court
Southern District of California
333 West Broadway Suite 420
San Diego, California 92101

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